

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,

Debtor

PROMESA

Title III

No. 17 BK 3566-LTS

**LIMITED JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN
OPPOSITION TO CLAIMANTS' MOTION FOR JUDGMENT ON THE PLEADINGS
PURSUANT TO FED. R. CIV. P. 12(c)**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Committee”)² hereby submits this limited joinder in the Oversight Board’s *Opposition to Claimants’ Motion Pursuant to Fed. R. Civ. P. 12(c) for Judgment on the Pleadings* [Docket No. 13590 in Case No. 17-3283] (the “12(c) Opposition”) in opposition to the *Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c)* [Docket No. 13400] (the “12(c) Motion”), filed by certain beneficial owners of bonds issued by ERS (as defined in the 12(c) Motion, the “Claimants”).

Specifically, the Committee joins in the following argument sections and paragraphs of the 12(c) Opposition: paragraphs 14 through 16 of Argument Section I.A; Argument Section II.C; Argument Section II.D (with the exception of paragraph 41); Argument Section II.E; Argument Section II.F; and Argument Section III.

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² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

WHEREFORE, the Committee respectfully requests that the Court deny the 12(c) Motion and grant any other relief the Court may deem appropriate.

Dated: July 8, 2020

/s/ Luc A. Despins.
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